

2007-016236

SF

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 MARK KAPITI,

PLAINTIFF,

4 -against-

Index No.:

5
6 RAYMOND W. KELLY, in his official Capacity as COMMISSIONER of
7 NEW YORK CITY POLICE DEPARTMENT, PROPERTY CLERK, NEW YORK
8 CITY POLICE DEPARTMENT and THE CITY of NEW YORK,

DEFENDANTS.

9 THE CITY OF NEW YORK,

THIRD-PARTY PLAINTIFF,

10
11 -against-

12 AMERICAN HONDA FINANCE CORPORATION d/b/a
13 HONDA FINANCIAL SERVICES,

THIRD-PARTY DEFENDANT.

14
15 DATE: May 30, 2008

16 TIME: 11:10 a.m.

17
18
19 EXAMINATION BEFORE TRIAL of the Defendant,

20 AMERICAN HONDA FINANCE CORPORATION d/b/a HONDA FINANCIAL

21 SERVICES, by a Witness, TARA SCHOOLKRAFT, taken by the

22 Respective Parties, pursuant to a Court Order, held at the

23 office of MICHAEL A. CARDOZO ESQ., CORPORATION COUNSEL, 100

24 Church Street, New York, New York 10007, before a Notary

25 Public of the State of New York.

SCHOOLKRAFT

1 Q. I'd like to direct your attention to what's been
2 marked as Defendants' Exhibit W, it's 176. Before we go into
3 this document, I have a general question. When there are two
4 individuals named on a lease and there are outstanding
5 payments, is there any way to it determine who gets billed?

6 A. The primary person.

7 Q. How do you know who the primary person is?

8 A. Whoever is on the top of the contract and account.
9 Or you can also create a bill-to address. Which is sending
10 an invoice to a different statement as long as the customer
11 requests that invoice to go to a different address.

12 Q. If a customer requests that an invoice be sent to a
13 different address, would that be contained in that computer
14 system?

15 A. Yes.

16 Q. Directing your attention again to the document
17 marked Defendants' Exhibit W.

18 A. Yes.

19 Q. Do you recognize that particular document?

20 A. No.

21 Q. Have you seen documents like that before?

22 A. Yes.

23 Q. What is the purpose of this type of document?

24 A. This is an efficiency balance letter.

25 Q. What does that mean?